

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

**NOTICE OF MOTION**

vs.

Case No. 15-CR-143

JOSÉ RUBÉN GIL,

Defendant.

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S I R S :

PLEASE TAKE NOTICE that the undersigned will move this Court, at a date and time to be determined by this Court, for the following relief:

- (1) An order sealing Mr. Gil's motion for modification of sentence of imprisonment; and
- (2) Such other and further relief as the Court deems proper.

DATED: April 21, 2020  
Buffalo, New York

Respectfully submitted,

*/s/ Joseph M. LaTona*  
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JOSÉ RUBÉN GIL  
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TO: JAMES P. KENNEDY, JR., ESQ.  
United States Attorney for the  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
Attn: MEGHAN A. TOKASH, ESQ.  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on April 21, 2020 I electronically filed the preceding Notice of Motion with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

**Meghan A. Tokash, Esq.  
Assistant United States Attorney**

**Defense Counsel**

I further hereby certify that I have mailed by United States Postal Service said document to the following non-CM/ECF participants:

*/s/ Sandra Lee Wright*  
\_\_\_\_\_  
SANDRA LEE WRIGHT